

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
ANDERSON DIVISION

Roderick Winkler,

Plaintiff,

vs.

Albert Ray Humphrey,

Defendant.

CIVIL ACTION NO: 8:18-cv-01049-TMC

**DEFENDANTS ANSWERS TO LOCAL
CIVIL RULE 26.01
INTERROGATORIES**

Defendant by and through its attorneys, hereby answers Local Civil Rule 26.01

Interrogatories as follows:

(A) State the full name, address, and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

ANSWER: None known at this time.

(B) As to each claim, state whether it should be tried jury or non-jury and why.

ANSWER: Defendant requests that this matter be heard by a jury as there are questions of fact.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

ANSWER: Defendant is an individual

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).

ANSWER: Upon present information and belief, Defendant contends this case was filed in the appropriate division.

(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

ANSWER: Upon present information and belief, Defendant is not aware of any other matter pending in this District to which this action would be related in whole or in part.

(F) If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

ANSWER: Defendant is properly identified.

(G) If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

ANSWER: Defendant contends the driver of the vehicle Plaintiff was in is at fault for the accident at issue in this litigation.

s/George V. Hanna, IV
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